

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
	:	VIOLATION:
LISANDRO PEREZ	:	8 U.S.C. §§ 1326(a) and (b)(2)
a/k/a Ismael Martinez-Crespo	:	(illegal reentry after deportation - 1 count)
	:	Notice of prior conviction
	:	Notice of additional factor

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about December 6, 2004, in the Eastern District of Pennsylvania, defendant

**LISANDRO PEREZ,
a/k/a Ismael Martinez-Crespo,**

an alien who had previously been deported from the United States on or about April 14, 2004, was found in the United States, having knowingly and unlawfully re-entered the United States without first applying to the Attorney General of the United States or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a), (b)(2).

NOTICE OF PRIOR CONVICTION

THE GRAND JURY FURTHER CHARGES THAT:

Defendant **LISANDRO PEREZ, a/k/a Ismael Martinez-Crespo**, committed the offense charged in Count One of this indictment after having been convicted of the following felony offense:

On or about December 11, 2003, in the Court of Common Pleas, County of Philadelphia, the defendant pled guilty to criminal conspiracy and manufacture, delivery, or possession with intent to manufacture or deliver a controlled substance. On or about January 22, 2004, the defendant received a sentence of four years probation.

NOTICE OF ADDITIONAL FACTOR

THE GRAND JURY FURTHER CHARGES THAT:

Prior to committing the offense charged in Count One of this indictment, the defendant **LISANDRO PEREZ, a/k/a Ismael Martinez-Crespo**, was previously deported from the United States after conviction for a felony drug trafficking offense for which the sentence imposed was 13 months or less, as described in U.S.S.G. § 2L1.2(b)(1)(B).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney